

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**INSTITUTIONAL RESPONSES OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORIES OF THE NATIONAL POSTAL MAIL HANDLERS UNION  
(NPMHU/USPS-1 AND 2, PARTS (B) AND (C))**

The United States Postal Service hereby provides its institutional responses to the above-referenced interrogatories of the National Postal Mail Handlers Union, dated April 2, 2012. Each interrogatory is stated verbatim and is followed by the response. Responses to NPMHU/USPS-2, parts (a) and (d) are forthcoming.

Respectfully submitted,

Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing and Product Support

Matthew J. Connolly  
Attorney

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1137  
(202) 268-8582; Fax -5418  
matthew.j.connolly@usps.gov  
May 8, 2012

## **INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

**NPMHU/USPS-1.** Please provide all spreadsheets, schedules, maps, and other documents reviewed by witness Martin's office or anyone else at Headquarters with respect to the development or approval of any of the AMP studies announced on February 23, including those referenced in Ms. Martin's testimony at page 1197, lines 15-17 and pages 1202, lines 7-9, pages 1203, lines 6-14.

### **RESPONSE:**

On April 6, 2012, the Postal Service filed a partial objection to this interrogatory.

In its objection, the Postal Service stated that, to the extent this interrogatory seeks the production of the proposed transportation schedules to which witness Martin refers in her oral testimony, the Postal Service intends to provide a response to this interrogatory. All of the available, proposed transportation schedules that have been provided to witness Martin's have been filed in library reference USPS-LR-N2012-1/78.

## INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY

**NPMHU/USPS-2.** With respect to the Springfield, MO AMP:

(a) Please explain why the study states that several large pieces of processing equipment will need to be added to the Kansas City facility (see page 8), but there is no additional projected maintenance cost for mail processing equipment (see page 37).

(b) Referring to page 41, please explain why the “proposed result” for both the losing facilities is the same as the “current” mileage for the losing facility, yet the study projects \$578,593 in HCR contract savings from the losing facility.

(c) Please explain why “Q” refers to when describing frequency of HCR transportation routes. For instance, in the Springfield, MO, AMP study, what does it mean when it says “modify existing HCR 64014 – 14 frequency Q6; Change departure time from 1900 to 1830 and the frequency from Q6 to Q7.”

(d) Please explain how the estimated on-time costs of \$465,000 for relocation on page 45 was calculated, given that the staffing matrices in the AMP indicate that 212 craft employees and 22 management employees will need to be relocated to Kansas City, and previous testimony has stated that average relocation costs in 2011 were \$5,831 per employee (APWU/USPS-T8-2).

### RESPONSE:

(a) [A response is forthcoming.]

(b) The AMP package contains transportation worksheets that begin on page 38 and continue through page 40. On page 40, the “proposed result” (582,641) for the losing facility, Springfield MO P&DF, is not the same as the “current mileage” (1,119,498) for the losing facility. The “proposed result” is the sum of the total number of proposed *trips* impacted and is not an estimate of *mileage*. The study projects a savings because of the difference between the current cost (\$1,544,770) and the proposed cost (\$966,177) is \$578,593.

(c) Alphabetic characters such as the one referred to in the interrogatory represent the frequency of a trip before, during, and after a holiday. Numeric values determine the day of the week a trip operates, beginning with the designation of “1” for Monday and ending with the designation of

**INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE TO  
NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

**RESPONSE TO NPMHU/USPS-2 (CONT.):**

"7" for Sunday. In the example provided, the letter "Q" indicates that the trip will operate on all holidays other than Martin Luther King's Birthday, Washington's Birthday, Columbus Day, and Veteran's Day. The change from "Q6" to "Q7" in the referenced statement means that the trip will now operate on all holidays other than the ones identified above as well as on Sunday ("7"), rather than on those holidays and Saturday ("6").

(d) [A response is forthcoming.]